UNITED STATES DISTRICT COURT

DISTRICT OF SOUTH DAKOTA

SOUTHERN DIVISION

TIMOTINI DOMOTITE

IMOTH I. DONOHUE,) Case No. 4:22-CV-4044-LLP
Plaintiff,)
v. ARTHUR J. GALLAGHER & CO., a Delaware corporation; and BOB JACOBSEN, Defendants.) AFFIDAVIT OF) STEVEN W. SANFORD)))
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STATE OF SOUTH DAKOTA) : SS COUNTY OF MINNEHAHA)	

Steven W. Sanford, being first duly sworn on oath, deposes and states as follows:

- 1. I am one of the attorneys of record for Plaintiff above-named. I have personal knowledge of the facts stated in this Affidavit.
- 2. Attached as Exhibit A are relevant portions of Defendants' responses to Plaintiff's Requests for Production of Documents (First Set), particularly, the objection asserted to Request 11 asking for documents that would constitute "a contract or agreement in force on January 25, 2022 with any insurance pool based in South Dakota."
- 3. Attached together as Exhibit B are AJB emails produced in discovery as AJG 000158-62. They are separately filed under seal.

Dated: August <u>5</u>, 2022

Steven W. Sanford

Subscribed and sworn to before me this 5th day of August, 2022

My commission expires:

GINA R. LEISINGER